

REMARKS

The Office Action mailed March 23, 2006 allowed claim 31, and rejected claims 7 and 8. Claims 1-6 and 9-38 had been canceled.

Claims 7 and 8 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,837,489 (hereinafter Kim) in view of U.S. Patent No. 4,986,525 (hereinafter Takagi) in view of U.S. Patent No. 6,648,322 (hereinafter Park) and in further view of U.S. Patent No. 6,568,674 (hereinafter Matsuda). There is no motivation to combine these four separate references and therefore the rejection is improper.

Kim discloses a jam removing apparatus directed to removing a jammed sheet from the media path. A gear assembly transfers the jammed sheet only in a paper supplying direction or downstream direction and prevents movement of the sheet in a backwards or upstream direction. In one embodiment, the apparatus comprises a pickup roller 10, an automatic document feeder (ADF) roller 20 rotated only in a clockwise direction by an ADF gear 21 and clutch 22, a feed roller 110, and a discharge roller 50. A motor 70 is operatively connected to the ADF roller 20 and pickup roller 10 by a first gear train 60, to the feed roller 110 through a middle gear 101, and to the discharge roller 50 with a second gear train 80. Rotation of the motor 70 causes the media sheets to move along the media path by the pickup roller 10, ADF roller 20, feed roller 110, and discharge roller 50. **The motor 70 only operates in a first direction because reverse operation in a second direction would drive the sheet backwards or in an upstream direction. This is the exact movement that Kim is trying to prevent.**

Kim further includes a jam removing device 100 associated with the gear trains and middle gear. The jam removing device 100 includes a handle that is rotated by the user to remove the jammed paper that is stuck at a point along the media path. When the user rotates the jam removing handle 123 in the counterclockwise direction, the feed roller 110 is rotated to

transfer the jammed paper downstream along the media path to the distribution roller 50. If a user rotates the handle 123 in the clockwise direction, a one-way clutch 103 at the middle gear 101 prevents rotation of the feed roller 110 in the wrong direction. This prevents inadvertent movement of the jammed media sheet in the wrong direction (i.e., upstream and away from the distribution roller 50).

The Office Action admits that Kim does not disclose a swing arm. The Office Action cites Takagi which includes a motor connected to a swing arm 15 that has a first gear 16 on a first arm and a second gear 17 on a second arm. Driving the motor M in a first, forward direction causes the swing arm to pivot in a first direction, and driving the motor in a second, reverse direction causes the swing arm to pivot in a second direction.

It is not obvious to combine the teachings of Kim with the swing arm of Takagi. First, Kim is directed to removal of a sheet after it has become jammed along the media path. Takagi is directed to moving media sheets along a media path, not in removing a sheet that has become jammed along the media path. There is no motivation to combine together these two unrelated references. The Office Action provides a conclusory statement that it would be obvious to combine these references together. However, the Office Action does not show any motivation in either reference to combine these teaches together into a single device.

The rejection is also improper because Kim cannot operate with a motor that runs in both forward and reverse directions. Kim specifically teaches against inadvertently operating the rollers in a reverse direction and driving the media sheet backwards in an upstream direction (Col. 2, line 66 – Col. 3, line 9). Kim is directed to jam prevention by including a jam removing device to a gear train and ensuring that the rollers operate in only a paper driving direction. It would appear that operating the motor in a reverse direction would cause one or more of the rollers that contact the media sheet to rotate and drive the paper backwards along the media path. This is the exact event that Kim is trying to prevent.

Specifically, it would appear that at least driving the motor in the reverse direction would cause the distribution roller 50 to drive the media sheets in a backwards directions. Therefore, it is improper to combine these references together and the rejection to claims 7 and 8 are improper.

The Office Action further admits that neither Kim nor Takagi discloses all the elements of these claims. The Office Action further finds it necessary to combine third and fourth references, Park and Matsuda, for additional elements. It appears that the Office Action improperly picks-and-chooses separate elements from these four completely separate references to combine together to make the invention disclosed in these claims. The Office Action makes a conclusory statement that it is obvious to combine these references together without providing any more substantial reasoning for such a conclusion.

Therefore, it is improper to combine together these four separate references to make obvious claims 7 and 8. These claims are not obvious and are in condition for allowance.

The Office Action indicates that claim 31 is allowed. New claims 39 and 40 have been added that depend from claim 31. These claims add further details to moving the media sheet along the media path and are patentable for at least the same reasons as claim 31.

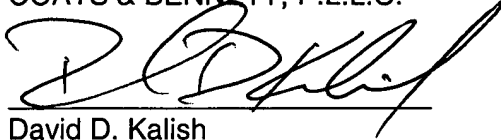
New claims 41-46 are the same as originally filed claims 9-14. Independent claim 41 (original claim 9) was rejected in an Office Action dated October 10, 2005 as being unpatentable over Kim in view of Takagi in view of Park and further in view of Matsuda. This claim and dependent claims 42-46 are allowable for at least the same reasons stated above with reference to claims 7 and 8.

News claims 47-51 are the same as originally filed claims 20-24. Independent claims 47 and 48 (original claims 20 and 21) were rejected in the Office Action dated October 10, 2005 under 35 U.S.C. 103(a) as being unpatentable over Kim in view of Takagi, and further in view of Park. These independent claims, and dependent claims 49-51 are allowable for at least the same reasons stated above with reference to claims 7 and 8.

In view of the above remarks and amendments, the Applicants submit that the pending claims are in condition for allowance and such action is respectfully requested. If any issues remain unresolved, the under-signing attorney requests a telephone interview to expedite allowance and issuance.

Respectfully submitted,

COATS & BENNETT, P.L.L.C.

A handwritten signature in black ink, appearing to read 'D. Kalish', written over a horizontal line.

David D. Kalish
Registration No.: 42,706

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P.O. Box 5
Raleigh, NC 27602
Telephone: (919) 854-1844
Facsimile: (919) 854-2084